

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11456-RWZ

GENERAL ELECTRIC MORTGAGE
INSURANCE CORPORATION,

Plaintiff,
Judgment Creditor,

v.

CHI CHEN
A/K/A CHI CHEN HU,
A/K/A TRACY CHEN,

Defendant
Judgment Debtor.

U.S. DISTRICT COURT
FOR THE DISTRICT OF
MASSACHUSETTS
2004 AUG -9 P 1:51

**PLAINTIFF, GENERAL ELECTRIC MORTGAGE
INSURANCE CORPORATION'S CERTIFICATE
OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)
CONCERNING MOTION TO SERVE SUBPOENA *DUCES TECUM*
UPON CHING YEE M. TSUI VIA INTERNATIONAL MAIL**

The plaintiff, General Electric Mortgage Insurance Corporation, through its counsel, Richard W. Gannett ("Gannett"), files the within certificate of compliance with Local Rule 7.1(A)(2) concerning a motion to serve a Subpoena *Duces Tecum* upon a non-party residing in Hong Kong via International Mail. In support of this certificate, Gannett states as follows:

1. On June 24, 2004, Gannett telephoned Michael R. Levin ("Levin"), counsel to Ching Yee M. Tsui, to discuss Tsui's compliance with an order of the Middlesex County Superior Court regarding filing a motion to dissolve an attachment and the possibility of voluntarily producing Tsui for deposition.

2. On June 28, 2004, Gannett again contacted Levin to discuss this recently filed action and suggested that GEMIC would seek to depose Tsui in this action.
3. Attorney Levin stated that he was unable to answer the substance of the inquiry on June 28, 2004, but asked whether GEMIC "can give [him] until Friday [July 2, 2004] to get back to [GEMIC]."
4. Attorney Levin never responded to the June 28, 2004 inquiry.
5. As a courtesy to Levin and Tsui, Gannett waited an additional month before filing GEMIC's Motion to Serve a Subpoena *Duces Tecum* upon a non-party residing in Hong Kong via International Mail in an effort to avoid additional motion practice.

General Electric Mortgage Insurance Corporation,
Plaintiff,
Judgment Creditor,
By its attorney,

Richard W. Gannett, Esquire
BBO #184430
Gannett & Associates
165 Friend Street, Suite 200
Boston, MA 02114-2025
(617) 367-0606

Dated: August 6, 2004

CERTIFICATE OF SERVICE

I, Richard W. Gannett, hereby certify that on August 6, 2004, I served a copy of the within Plaintiff, General Electric Mortgage Insurance Corporations's Certificate of Compliance With Local Rule 7.1(A)(2) Concerning Motion to Serve Subpoena *Duces Tecum* upon Ching Yee M. Tsui via International Mail upon the following individual, by U.S. Mail, postage prepaid:

Michael R. Levin, Esq.
1500 Providence Highway
Suite 37
Norwood, MA 02062

Richard W. Gannett